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September 8, 2023

Honorable Sanket J. Bulsara  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201


RE: LoCurto v. United States of America  
Civ. No. 10-cv-4589  
**By ECF**

Dear Judge Bulsara:

We have an evidentiary hearing scheduled for 10:30 am on September 14, 2023. I plan to put Mr. LoCurto on as the first witness and his testimony is likely to take us through lunch, if not longer, depending on the cross-examination. I will have one or two witnesses after that. I think it is unlikely we will finish on Thursday unless you order us to present evidence late into the day. I know that Mr. Batchelder is expected to testify for the government, remotely from New Hampshire, and that may also take some time. Will your honor have time on Friday morning to hear testimony? Please let us know. We should be able to finish the hearing on Friday.

Thank you for your time and consideration of this request.

Best Regards,

  
Bernard K. Freamon, Esq.  
Attorney for Stephen LoCurto